

STREAMLINED EIS/EIR OUTLINE

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Switched

Placement of Cumulative Impact Analyses in “Streamlined” EIS outline

During the development of the “Streamlined” EIS format, in which the chapter on Affected Environment and the chapter on Environmental Consequences are condensed into one comprehensive chapter, there was a lot of discussion among Caltrans environmental and legal staff, FHWA staff, and EPA staff on the appropriate placement of cumulative impact analyses.

The discussion centered around whether to have the analyses of cumulative impacts of each resource discussed in each subsection of Chapter 3 or to have a separate chapter devoted to cumulative impacts. The former approach has the benefit of ensuring that each resource is considered but lacks the opportunity for an interdisciplinary, comprehensive analysis; the latter approach affords the opportunity for a comprehensive analysis, but would require a specific analysis for each resource which is not appropriate for an integrated discussion. A separate chapter would also be artificially separated from Chapter 3, in which the analyses of direct and indirect impacts are presented, and therefore obviate the benefits to the reader of having combined Chapters 3 and 4 of the traditional EIS format.

As a compromise, the outline indicates two locations for cumulative impact analyses, under each resource subsection in Chapter 3 as well as in Chapter 4, depending on the nature and complexity of the analysis. If there will be no cumulative impacts related to a particular resource area, the subsection within Chapter 3 should so state. The reader and reviewer then knows it was not overlooked. If there is a need for a cumulative impact analysis for that specific resource, but it is not appropriate to integrate that analysis with other analyses, it should also be presented in the appropriate subsection of Chapter 3. An example might be a cumulative impact analysis of historic resources in a specific geographic area that has no connection to another analysis in the document concerning, for example, cumulative habitat issues. However, if the analysis of the habitat impacts is appropriately integrated with the analysis of endangered species impacts, wetland impacts, and noise impacts, etc., then an interdisciplinary, comprehensive analysis addressing all these related issues should be presented in Chapter 4, with a reference to that discussion in each of the subsections in Chapter 3. Chapter 4 is reserved for such an integrated analysis. If the particular project impacts do not lend themselves to such an analysis, Chapter 4 may be omitted.